

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

D.T.E. 01-31

REQUEST: AT&T Communications of New England, Set #4

DATED: October 24, 2001

ITEM: ATT-VZ 4-1 For each report dimension and service disaggregation indicated in Instruction 13, state Verizon's annual revenues for special services from 1998 to the present.

REPLY: Verizon MA objects to this request on the grounds that the request is overly broad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. This request is identical to a request made by WorldCom and AT&T in D.T.E. 01-34 regarding Special Access Services. Subject to and without waiving its objection, attached is the response to the relevant request in D.T.E. 01-34.

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

D.T.E. 01-31

REQUEST: AT&T Communications of New England, Set #4

DATED: October 24, 2001

ITEM: ATT-VZ 4-2 For each report dimension and service disaggregation indicated in Instruction 13 and utilizing the time period specified in Instruction 9, state for each month the number of circuits (as defined in Instruction No. 14) ordered or requested from Verizon, excluding disconnects, Verizon test orders, Verizon administrative orders, and records only orders.

REPLY: Verizon MA objects to this request on the grounds that the request is overly broad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. This request is identical to a request made by WorldCom and AT&T in D.T.E. 01-34 regarding Special Access Services. Subject to and without waiving its objection, attached is the response to the relevant request in D.T.E. 01-34.

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

D.T.E. 01-31

REQUEST: AT&T Communications of New England, Set #4

DATED: October 24, 2001

ITEM: ATT-VZ 4-3 For each report dimension and service disaggregation indicated in Instruction 13 and utilizing the time period specified in Instruction 9, state the number of circuits (as defined in Instruction No. 14) that Verizon completed each month, excluding disconnects, Verizon test orders, Verizon administrative orders, and records only orders.

REPLY: Verizon MA objects to this request on the grounds that the request is overly broad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. This request is identical to a request made by WorldCom and AT&T in D.T.E. 01-34 regarding Special Access Services. Subject to and without waiving its objection, attached is the response to the relevant request in D.T.E. 01-34.

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

D.T.E. 01-31

REQUEST: AT&T Communications of New England, Set #4

DATED: October 24, 2001

ITEM: ATT-VZ 4-4 For each report dimension and service disaggregation indicated in Instruction 13 and utilizing the time period specified in Instruction 9, state for each month the number of completed circuits (as defined in Instruction No. 14) given in response to ATT-VZ 1-3 that were installed by the due date, excluding disconnects, Verizon test orders, Verizon administrative orders, and records only orders.

REPLY: Verizon MA objects to this request on the grounds that the request is overly broad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. This request is identical to a request made by WorldCom and AT&T in D.T.E. 01-34 regarding Special Access Services. Subject to and without waiving its objection, attached is the response to the relevant request in D.T.E. 01-34.

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

D.T.E. 01-31

REQUEST: AT&T Communications of New England, Set #4

DATED: October 24, 2001

ITEM: ATT-VZ 4-5 For each report dimension and service disaggregation indicated in Instruction 13 and utilizing the time period specified in Instruction 9, state for each month the number of completed circuits (as defined in Instruction No. 14) given in response to ATT-VZ 1-3 that were not installed by the due date, excluding disconnects, Verizon test orders, Verizon administrative orders, and records only orders. Please state:

- (a) the number of completed circuits (as defined in Instruction No. 14) not installed by the due date for Verizon reasons, including but not limited to, lack of Verizon facilities, Verizon personnel, or other reasons for which Verizon was responsible;
- (b) the number of completed circuits (as defined in Instruction No. 14) not installed by the due date as a result of CNR.

REPLY: Verizon MA objects to this request on the grounds that the request is overly broad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. This request is identical to a request made by WorldCom and AT&T in D.T.E. 01-34 regarding Special Access Services. Subject to and without waiving its objection, attached is the response to the relevant request in D.T.E. 01-34.

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

D.T.E. 01-31

REQUEST: AT&T Communications of New England, Set #4

DATED: October 24, 2001

ITEM: ATT-VZ 4-6 For each report dimension and service disaggregation indicated in Instruction 13 and utilizing the time period specified in Instruction 9, as of the end of each month, provide the number of uncompleted circuits (as defined in Instruction No. 14) categorized by "age" (defined as the number of business days since an executable service request was received). Please exclude disconnects, Verizon test orders, Verizon administrative orders and records only orders. Provide age groups as follows: 1-5 days, 6-10 days, 11-20 days, 21-30 days, 31-40 days, and 40+ days.

REPLY: Verizon MA objects to this request on the grounds that the request is overly broad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. This request is identical to a request made by WorldCom and AT&T in D.T.E. 01-34 regarding Special Access Services. Subject to and without waiving its objection, attached is the response to the relevant request in D.T.E. 01-34.

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

D.T.E. 01-31

REQUEST: AT&T Communications of New England, Set #4

DATED: October 24, 2001

ITEM: ATT-VZ 4-7 For each of your answers to Questions 5 and 6, and all broken-out subparts thereto, provide the ground(s) asserted by Verizon for failing to complete the order on the due date including, but not limited to:

- (a) lack of Verizon IOF facilities,
- (b) lack of Verizon OSP or Loop facilities;
- (c) lack of Verizon CO;
- (d) due to Verizon CPC, Verizon CATC, or Verizon Dispatch;
and/or
- (e) other reasons for which Verizon was responsible; or
- (f) CNR.

REPLY: Verizon MA objects to this request on the grounds that the request is overly broad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. This request is identical to a request made by WorldCom and AT&T in D.T.E. 01-34 regarding Special Access Services. Subject to and without waiving its objection, attached is the response to the relevant request in D.T.E. 01-34.

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

D.T.E. 01-31

REQUEST: AT&T Communications of New England, Set #4

DATED: October 24, 2001

ITEM: ATT-VZ 4-8 For each report dimension and service disaggregation indicated in Instruction 13, describe any processes, policies, or practices establishing priorities for assigning facilities (including but not limited to Verizon IOF, OSP, CO equipment) among:

- (a) circuits (as defined in Instruction No. 14) ordered or requested by CLECs, IXC's and ISPs;
- (b) circuits (as defined in Instruction No. 14) ordered or requested by Verizon retail customers and affiliated carriers;
- (c) circuits ordered by CLECs/ICOs for Network Interconnection with Verizon;
- (d) circuits ordered by Verizon for Network Interconnection with CLECs/ICOs;
- (e) circuits ordered by Verizon or Verizon affiliates to build or augment their own networks including but not limited to local, LD, Data or Ip networks when all circuits (as defined in Instruction No. 14) ordered or requested cannot be completed by the due date due to lack of Verizon facilities.

REPLY: Verizon MA objects to this request on the grounds that the request is overly broad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. This request is identical to a request made by WorldCom and AT&T in D.T.E. 01-34 regarding Special Access Services. Subject to and without waiving its objection, Verizon MA will supplement this response with the relevant reply that will be filed in D.T.E. 01-34 when it becomes available.

**Verizon New England Inc.
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Commonwealth of Massachusetts

D.T.E. 01-31

REQUEST: AT&T Communications of New England, Set #4

DATED: October 24, 2001

ITEM: ATT-VZ 4-9 In order for Verizon to meet the demand generated by each report dimension and service disaggregation indicated in Instruction 13:

- (a) separately describe any processes, policies, or practices for obtaining and responding to demand forecasts from (i) Verizon retail customers; (ii) non affiliated carriers aggregate; and (iii) affiliated carriers aggregate;
- (b) separately describe any processes, policies, or practices for obtaining and responding to Verizon's own demand forecasts.
- (c) separately describe the process Verizon uses to aggregate all forecasts and state whether Verizon allocates capital to, and builds to meet, the aggregate demand from all forecast inputs.

REPLY: Verizon MA objects to this request on the grounds that the request is overly broad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. This request is identical to a request made by WorldCom and AT&T in D.T.E. 01-34 regarding Special Access Services. Subject to and without waiving its objection, Verizon MA will supplement this response with the relevant reply that will be filed in D.T.E. 01-34 when it becomes available.

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

D.T.E. 01-31

REQUEST: AT&T Communications of New England, Set #4

DATED: October 24, 2001

ITEM: ATT-VZ 4-10 For each report dimension and service disaggregation indicated in Instruction 13, describe Verizon's policies, practices, and processes for handling non-executable service requests, *e.g.*, if Verizon uses the query process for carrier customers, please describe the process that Verizon uses with its retail customers.

REPLY: Verizon MA objects to this request on the grounds that the request is overly broad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. This request is identical to a request made by WorldCom and AT&T in D.T.E. 01-34 regarding Special Access Services. Subject to and without waiving its objection, Verizon MA will supplement this response with the relevant reply that will be filed in D.T.E. 01-34 when it becomes available.

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

D.T.E. 01-31

REQUEST: AT&T Communications of New England, Set #4

DATED: October 24, 2001

ITEM: ATT-VZ 4-11 For each report dimension and service disaggregation indicated in Instruction 13, describe Verizon's policies, practices, and processes for obtaining data from each of the categories of customers in the report dimensions so that an executable service request can be created in the format required by Verizon, including but not limited to:

- (a) identifying any instruction or materials provided by Verizon to CLECs, IXC's or ISPs;
- (b) any organizations, centers, and titles of individuals involved in any such processes; and
- (c) whether steps in the various processes are performed manually or electronically.

REPLY: Verizon MA objects to this request on the grounds that the request is overly broad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. This request is identical to a request made by WorldCom and AT&T in D.T.E. 01-34 regarding Special Access Services. Subject to and without waiving its objection, Verizon MA will supplement this response with the relevant reply that will be filed in D.T.E. 01-34 when it becomes available.

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

D.T.E. 01-31

REQUEST: AT&T Communications of New England, Set #4

DATED: October 24, 2001

ITEM: ATT-VZ 4-12 For each report dimension and service disaggregation indicated in Instruction 13:

- (a) describe any policies, practices and processes Verizon uses to define a CNR situation and to determine that a past due order is properly coded CNR; and
- (b) describe any policies, practices and processes relating to documenting or reporting a CNR situation for past due orders

REPLY: Verizon MA objects to this request on the grounds that the request is overly broad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. This request is identical to a request made by WorldCom and AT&T in D.T.E. 01-34 regarding Special Access Services. Subject to and without waiving its objection, Verizon MA will supplement this response with the relevant reply that will be filed in D.T.E. 01-34 when it becomes available.

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

D.T.E. 01-31

REQUEST: AT&T Communications of New England, Set #4

DATED: October 24, 2001

ITEM: ATT-VZ 4-13 For each report dimension and service disaggregation indicated in Instruction 13 and utilizing the time period specified in Instruction 9, state for each month the number of past due orders coded CNR, excluding disconnects, Verizon test orders, Verizon administrative orders, and records only orders.

REPLY: Verizon MA objects to this request on the grounds that the request is overly broad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. This request is identical to a request made by WorldCom and AT&T in D.T.E. 01-34 regarding Special Access Services. Subject to and without waiving its objection, attached is the response to the relevant request in D.T.E. 01-34.

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

D.T.E. 01-31

REQUEST: AT&T Communications of New England, Set #4

DATED: October 24, 2001

ITEM: ATT-VZ 4-14 For each report dimension and service disaggregation indicated in Instruction 13, describe any policies, practices and processes Verizon uses to prevent a CNR situation. Your response should include, but not be limited to:

- (a) a description of the activities in which technicians engage (*e.g.*, please state whether technicians call the customer before attempting installation; if so, please state when such a call is made. Please state whether Verizon calls the ordering carrier if a customer is not ready; if so, please state whether the call is made from the customer's premises).
- (b) a description of any changes made to the CNR process over the past three years and the date(s) on which such changes were implemented;
- (c) a description of any training material(s) or customer notification(s) regarding the CNR process.

REPLY: Verizon MA objects to this request on the grounds that the request is overly broad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. This request is identical to a request made by WorldCom and AT&T in D.T.E. 01-34 regarding Special Access Services. Subject to and without waiving its objection, Verizon MA will supplement this response with the relevant reply that will be filed in D.T.E. 01-34 when it becomes available.

**Verizon New England Inc.
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Commonwealth of Massachusetts

D.T.E. 01-31

REQUEST: AT&T Communications of New England, Set #4

DATED: October 24, 2001

ITEM: ATT-VZ 4-15 For each report dimension and service disaggregation indicated in Instruction 13, state for each month the average number of business days before Verizon committed to an order due date in a FOC, or by any other means, once an executable service request was received. If Verizon does not provide a FOC for its retail customers and its affiliated carrier customers, explain in detail:

- (a) how Verizon notifies retail customers and affiliated carrier customers of the committed due date, and
- (b) the internal process through which such due date is generated and provided.

REPLY: Verizon MA objects to this request on the grounds that the request is overly broad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. This request is identical to a request made by WorldCom and AT&T in D.T.E. 01-34 regarding Special Access Services. Subject to and without waiving its objection, Verizon MA will supplement this response with the relevant reply that will be filed in D.T.E. 01-34 when it becomes available.

VZ # 179

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

D.T.E. 01-31

REQUEST: AT&T Communications of New England, Set #4

DATED: October 24, 2001

ITEM: ATT-VZ 4-16 For each report dimension and service disaggregation indicated in Instruction 13, describe:

- (a) how Verizon establishes due dates and communicates those due dates to the customer;
- (b) the process by which facility checks are performed prior to establishing and/or communicating such due dates;
- (c) whether any part of the process for establishing a due date involves negotiations with the customer. If so, please explain in detail the nature of those negotiations.
- (d) any changes Verizon has made over the past three years to the process for establishing a due date and the date(s) on which such changes were implemented;
- (e) any policies, practices and processes concerning how and when Verizon notifies customers (including CLEC end users) that a jeopardy situation may occur. Please state for each month the average number of business days in advance of the original due date by which customers are informed of the possible jeopardy situation.
- (f) describe any policies, practices and processes concerning how and when Verizon notifies customers (including CLEC end users) that a jeopardy situation has occurred. Please state for

each month the average number of business days in advance of the original due date by which customers are informed of the jeopardy situation.

- (g) any policies, practices and processes concerning how and when Verizon negotiates a new due date with customers (including CLEC end users) when a jeopardy situation may, will or has occurred.
- (h) any training materials and/or notification provided to employees regarding the policies, practices, or processes requested in (e) – (g).

REPLY:

Verizon MA objects to this request on the grounds that the request is overly broad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. This request is identical to a request made by WorldCom and AT&T in D.T.E. 01-34 regarding Special Access Services. Subject to and without waiving its objection, Verizon MA will supplement this response with the relevant reply that will be filed in D.T.E. 01-34 when it becomes available.

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

D.T.E. 01-31

REQUEST: AT&T Communications of New England, Set #4

DATED: October 24, 2001

ITEM: ATT-VZ 4-17 For each report dimension and service disaggregation indicated in Instruction 13 and utilizing the time period specified in Instruction 9, state for each month:

- (a) the average installation interval; and
- (b) the average number of business days between the date on which an executable service request was received and the due date committed to by Verizon.

REPLY: Verizon MA objects to this request on the grounds that the request is overly broad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. This request is identical to a request made by WorldCom and AT&T in D.T.E. 01-34 regarding Special Access Services. Subject to and without waiving its objection, attached is the response to the relevant request in D.T.E. 01-34.

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

D.T.E. 01-31

REQUEST: AT&T Communications of New England, Set #4

DATED: October 24, 2001

ITEM: ATT-VZ 4-18 For each report dimension and service disaggregation indicated in Instruction 13, describe any policies and practices relating to on-time installations, past due installations, and maintenance and repair with respect to, but not limited to, the following:

- (a) documenting and reporting;
- (b) employees; and
- (c) payments or credits to the various categories of customers.

REPLY: Verizon MA objects to this request on the grounds that the request is overly broad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. This request is identical to a request made by WorldCom and AT&T in D.T.E. 01-34 regarding Special Access Services. Subject to and without waiving its objection, Verizon MA will supplement this response with the relevant reply that will be filed in D.T.E. 01-34 when it becomes available.

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

D.T.E. 01-31

REQUEST: AT&T Communications of New England, Set #4

DATED: October 24, 2001

ITEM: ATT-VZ 4-19 For each report dimension and service disaggregation indicated in Instruction 13, describe any policies and practices relating to installation intervals for new special services with respect to, but not limited to, the following:

- (a) documenting and reporting;
- (b) employees;
- (c) and payments or credits to the various categories of customers.

REPLY: Verizon MA objects to this request on the grounds that the request is overly broad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. This request is identical to a request made by WorldCom and AT&T in D.T.E. 01-34 regarding Special Access Services. Subject to and without waiving its objection, Verizon MA will supplement this response with the relevant reply that will be filed in D.T.E. 01-34 when it becomes available.

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

D.T.E. 01-31

REQUEST: AT&T Communications of New England, Set #4

DATED: October 24, 2001

ITEM: ATT-VZ 4-20 For each report dimension and service disaggregation indicated in Instruction 13, describe any policies or practices relating to complaints by any customer concerning Verizon's performance (including but not limited to escalations) about new special service installations with respect to, but not limited to, the following:

- (a) documenting and reporting;
- (b) employees; and
- (c) payments or credits to the various categories of customers.

REPLY: Verizon MA objects to this request on the grounds that the request is overly broad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. This request is identical to a request made by WorldCom and AT&T in D.T.E. 01-34 regarding Special Access Services. Subject to and without waiving its objection, Verizon MA will supplement this response with the relevant reply that will be filed in D.T.E. 01-34 when it becomes available.

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

D.T.E. 01-31

REQUEST: AT&T Communications of New England, Set #4

DATED: October 24, 2001

ITEM: ATT-VZ 4-21 For each report dimension and service disaggregation indicated in Instruction 13 and utilizing the time period specified in Instruction 9, state for each month:

- (a) the number of installation trouble reports received; and
- (b) the amount of credits or payments issued to the various categories of customers.

REPLY: Verizon MA objects to this request on the grounds that the request is overly broad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. This request is identical to a request made by WorldCom and AT&T in D.T.E. 01-34 regarding Special Access Services. Subject to and without waiving its objection, Verizon MA will supplement this response with the relevant reply that will be filed in D.T.E. 01-34 when it becomes available.

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

D.T.E. 01-31

REQUEST: AT&T Communications of New England, Set #4

DATED: October 24, 2001

ITEM: ATT-VZ 4-22 For each report dimension and service disaggregation indicated in Instruction 13, describe any processes, policies or practices relating to installation trouble reports, including, but not limited to:

- (a) documenting and reporting;
- (b) employees, and
- (c) payments or credits issued to the various categories of customers.

REPLY: Verizon MA objects to this request on the grounds that the request is overly broad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. This request is identical to a request made by WorldCom and AT&T in D.T.E. 01-34 regarding Special Access Services. Subject to and without waiving its objection, Verizon MA will supplement this response with the relevant reply that will be filed in D.T.E. 01-34 when it becomes available.

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

D.T.E. 01-31

REQUEST: AT&T Communications of New England, Set #4

DATED: October 24, 2001

ITEM: ATT-VZ 4-23 For each report dimension and service disaggregation indicated in Instruction 13 and utilizing the time period specified in Instruction 9, state for each month:

- (a) the number of trouble reports after new installations; and
- (b) the amount of credits or payments issued to the various categories of customers.

REPLY: Verizon MA objects to this request on the grounds that the request is overly broad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. This request is identical to a request made by WorldCom and AT&T in D.T.E. 01-34 regarding Special Access Services. Subject to and without waiving its objection, Verizon MA will supplement this response with the relevant reply that will be filed in D.T.E. 01-34 when it becomes available.

VZ # 187

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

D.T.E. 01-31

REQUEST: AT&T Communications of New England, Set #4

DATED: October 24, 2001

ITEM: ATT-VZ 4-24 For each report dimension and service disaggregation indicated in Instruction 13, describe any processes, policies or practices relating to trouble reports after new installations, including, but not limited to:

- (a) documenting and reporting;
- (b) employees; and
- (c) payments or credits to the various categories of customers.

REPLY: Verizon MA objects to this request on the grounds that the request is overly broad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. This request is identical to a request made by WorldCom and AT&T in D.T.E. 01-34 regarding Special Access Services. Subject to and without waiving its objection, Verizon MA will supplement this response with the relevant reply that will be filed in D.T.E. 01-34 when it becomes available.

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

D.T.E. 01-31

REQUEST: AT&T Communications of New England, Set #4

DATED: October 24, 2001

ITEM: ATT-VZ 4-25 For each report dimension and service disaggregation indicated in Instruction 13, and at a minimum for: (1) Verizon Retail; (2) Non-affiliated carriers aggregate; and (3) Affiliated carriers aggregate, describe any Verizon policies, practices, and processes that enable such customers to review and/or retrieve on-line at no charge:

- (a) customer service records;
- (b) status of pending service requests;
- (c) design layout records of special services circuits (as defined in Instruction No. 14) ;
- (d) circuit details including assigned and spare ports;
- (e) current and previous bills;
- (e) usage patterns;
- (g) information on product availability and product descriptions; and
- (h) state whether any such processes, policies or practices vary according to the type of Service Disaggregation for each Report Dimension specified in Instruction 13, subsection b.

REPLY: Verizon MA objects to this request on the grounds that the request is overly broad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. This request is identical to a request made by WorldCom and AT&T in D.T.E. 01-34 regarding Special Access Services. Subject to and without waiving its objection, Verizon MA will supplement this response with the relevant reply that will be filed in D.T.E. 01-34 when it becomes available.

VZ #189

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

D.T.E. 01-31

REQUEST: AT&T Communications of New England, Set #4

DATED: October 24, 2001

ITEM: ATT-VZ 4-26 SBC Communications, Inc. ("SBC") and Verizon have stated that special access and private line services "belong in the same market" because both types of services "use the same facilities and are technically equivalent" and both "are provided by the same vendors to the same group of customers (predominantly large businesses)." *See* Comments of SBC and Verizon, at 13 n.32, *In the Matter of: Implementation of the Local Competition Provisions of the Telecommunications Act of 1996*, CC Docket 96-98 (dated April 5, 2001). State whether the Verizon agrees with each portion of this statement. Explain in detail the basis of your answer.

REPLY: Verizon MA objects to this request on the grounds that the request is overly broad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. This request is identical to a request made by WorldCom and AT&T in D.T.E. 01-34 regarding Special Access Services. Subject to and without waiving its objection, attached is the response to the relevant request in D.T.E. 01-34.